

Potential recommendation from the SSAB to Dr. Triay:

## **Disposition**

The Environmental Management Program across the U.S. Department of Energy Complex follows prescribed processes for disposition of property that is no longer needed by the federal government but may be of use to external entities. However, there is no Environmental Management policy and funding mechanism in place for items that have cultural/historic value to outside organizations unable to fund the physical transfer of these items.

Through Department of Energy orders and regulations, the current processes used for disposition of property associated with environmental restoration sites include:

- Prior to intrusive work, the site is evaluated in accordance with the National Historic Preservation Act (NHPA) and the appropriate action is taken
- Any items released for reuse or donation must first be evaluated for hazards (e.g. radiation) in accordance with directives and local procedures
- Items identified as hazardous or radioactive waste are appropriately disposed
- Items identified as potentially reusable are made available through the excess property procedures and typically removed/transported by the receiving entity
- Items identified as having no value through reuse but having potential cultural or historic value are made available through donation to museums and typically removed/transported by the receiving entity

After these processes are complete, some items may remain. Typically, these items are disposed as sanitary waste or allowed to remain in place. In some instances, items may have cultural or historic value but the receiving entity may not have a means of paying for removal/transport.

The EM SSAB urges the Department of Energy to be proactive in supporting the removing/transporting of items having cultural/historic value to outside organizations that are unable to fund the activity.

It is recommended that DOE formally recognize that transfer of these cultural/historic items represent beneficial reuse (and hence disposition) and as such these transportation costs be considered disposition costs.